

# DISTRICT ATTORNEY KINGS COUNTY

350 JAY STREET BROOKLYN, NY 11201-2908 (718) 250-2000 WWW.BROOKLYNDA.ORG

> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [########]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: HERMAN LAI

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move <u>in limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

## Disclosure # 1:

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

- 1. LEITOYA DIXON V. CITY OF NEW YORK, ET AL, 006723/2014, FILED IN KINGS COUNTY SUPREME COURT
- GALVIN DUDLEY V. CITY OF NEW YORK, ET AL 15-CV-04820, FILED IN THE EASTERN DISTRICT

#### Disclosure # 2:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 07/23/2015, AGAINST MOS LAI:

- THEFT OF TIME
- MISUSE OF TIME ON OVERTIME

CASE CLOSED ON 08/11/2016

ACTION TAKEN: SCHEDULE A COMMAND DISCIPLINE

## Disclosure # 3:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 02/01/2017, AGAINST MOS LAI:

1. FAIL TO NOTIFY - DUTY CAPTAIN/ OPERATIONS

CASE CLOSED ON 11/02/2017

ACTION TAKEN: A COMMAND DISCIPLINE ISSUED

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:

# Disclosure # 4:

CCRB CASE: 201601869 REPORT DATE: 03/08/2016 INCIDENT DATE: 03/07/2016

CCRB SUBSTANTIATED ALLEGATIONS:

- FORCE PEPPER SPRAY
- FORCE PHYSICAL FORCE
- ABUSE PREMISES ENTERED AND/OR SEARCHED
- ABUSE THREAT OF FORCE (VERBAL OR PHYSICAL)
- DISCOURTESY WORD

NYPD DISPOSITION: FORMALIZED TRAINING

Eric Gonzalez
District Attorney
Kings County